

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC., et al.,

Plaintiffs,

v.

ANGELA COLMENERO, In Her Official
Capacity As Interim Attorney General For
The State Of Texas

Defendant.

CASE NO. 1:23-cv-00917-DAE

**REBUTTAL DECLARATION OF KIMBERLY MEHLMAN-OROZCO, PHD IN
SUPPORT OF PLAINTIFFS' MOTION FOR EXPEDITED PRELIMINARY
INJUNCTION**

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DECLARATION OF DR. KIMBERLY MEHLMAN-OROZCO

I, DR. KIMBERLY MEHLMAN-OROZCO, do hereby state and declare:

I am over the age of 18 and the facts contained in the following Declaration are known to me of my own personal knowledge and if called upon to testify, I could and would completely do so.

Summary of Credentials

1. I received my B.S. from George Mason University *cum laude* in Administration of Justice, my M.A. from George Mason University in Justice, Law, and Crime Policy, and my Ph.D. in Criminology, Law and Society from George Mason University.
2. I currently serve as the Executive Director of an anti-trafficking non-profit organization—Freedom Light. In this capacity, I provide training and technical assistance to businesses on how to combat human trafficking.
3. I also am the Founder and CEO of Break the Chain LLC, where I actively serve as a human trafficking expert witness in criminal and civil cases across the United States (see Appendix A for a list of cases incorporated into my Curriculum Vitae).
4. I have authored a book on human trafficking, Hidden in Plain Sight: America's Slaves of the New Millennium, which received overwhelming praise from anti-trafficking experts and is used to train law enforcement. I have personally trained law enforcement on how to identify human trafficking, including:
 - Royal Canadian Mounted Police in Nova Scotia, Canada
 - Homeland Security Investigations in Buffalo, New York
 - Homeland Security Investigations in Raleigh, North Carolina
 - North Carolina State Bureau of Investigations in Raleigh, North Carolina
 - Montebello Police Department in Montebello, California
5. I previously served as an adjunct human trafficking subject matter expert for RAND Corporation, a nonprofit institution that helps improve policy and decision-making through research and analysis. In that capacity, I worked on three study proposals:
 - (i) Research design to evaluate the National Human Trafficking Hotline;
 - (ii) Development of an evidence based human trafficking risk assessment tool for organizations working with minors; and
 - (iii) Evaluating the outcomes of housing services for adult and juvenile human trafficking survivors.
6. A more detailed summary of my credentials is available in my Curriculum Vitae, which is attached hereto as Appendix A.

Materials Reviewed

In addition to the materials cited herein:

1. I have reviewed H.B. 1811, specifically Section 129B.004 “Sexual Materials Health Warnings;”
2. I have reviewed the Declaration of Dr. Vanessa Bouché; and
3. I have reviewed the sources apparently referenced¹ by Dr. Vanessa Bouché.

Rebuttal Opinions

Rebuttal Opinion 1: Dr. Bouché references no reliable, empirical data to conclude that the three sexual material health warnings are truthful, non-misleading, and consistent with the published academic and scientific literature examining the effects of pornography on children and adolescents.

While Dr. Bouché seems to reference the abstracts of several uncited sources, these quotes do not reflect the full content of the studies and exclude contradictory conclusions and limitations to the studies’ findings, which bely Dr. Bouché’s conclusions. Moreover, Dr. Bouché does not address countervailing empirical research. Finally, Dr. Bouché does not grapple with issues related to reliability and/or generalizability of her referenced materials, as well as the limitations of the findings of her own sources.

Rebuttal Opinion 2: Dr. Bouché references no reliable, empirical data to conclude that pornography is potentially biologically addictive, is proven to harm human brain development, desensitizes brain reward circuits, increases conditioned responses, and weakens brain function.

For example, Dr. Bouché refers to one article in attempt to claim that “scientific studies have indeed shown that internet pornography addiction fits into the addiction framework and shares similar basic mechanisms with substance addiction.” In the abstract of this study that she chose to reference, the authors liken Internet pornography addiction to substance addiction, as well as “Internet addiction and Internet Gaming Disorder.” However, the authors even recognize that “future research needs to address whether or not there are specific differences between substance and behavior addiction.” To be clear, the authors of the study Dr. Bouché chose to reference compare addiction involving “psychoactive substances such as alcohol, opioids and cocaine” to pathological behaviors such as “uncontrolled gambling, internet use, gaming, pornography, and sexual acting out.” Ultimately, Dr. Bouché fails to acknowledge the limitations of this research.

Additionally, in an attempt to support her opinion related to this topic, Dr. Bouché references the results of an article which state, “*Overlapping features exist between CSB and substance use disorders. Common neurotransmitter systems may contribute to CSB and substance use disorders, and recent neuroimaging studies highlight similarities*

¹ Note: Dr. Bouché failed to include in-text citations or footnotes in her declaration, but the sources were identified and are cited herein.

relating to craving and attentional biases.” However, Dr. Bouché fails to acknowledge the conclusions of the authors from the same article, which clearly state, “*Despite the growing body of research linking compulsive sexual behavior (CSB) to substance addictions, significant gaps in understanding continue to complicate classification of CSB as an addiction.*”

Last, in an attempt to support her opinion related to this topic, Dr. Bouché references an abstract of another article², which claims that “an increased use of Internet pornography decreased boys’ academic performance six months later.” However, in the abstract of the article, the authors recognize that this relationship may be spurious and explained by confounding variables such as self-discipline, engagement in sexual activities other than pornography, and total media exposure. Notably, the data for this article was collected in another country—Belgium.

Ultimately, despite the fact that Dr. Bouché’s own selected references suggest that there are “significant gaps in understanding” which “complicate” the classification of compulsive sexual behavior as an addiction, Dr. Bouché concludes that CSB is an addiction that “may be” amplified by Internet pornography. This conclusion isn’t adequately supported by her own references for her declaration.

Moreover, the use of the word “proven” in this sexual material health warning is counter to scientific principles. Regardless of academic discipline or field, the same principals are used to demarcate science from non-science/pseudoscience, and in order for theory to be considered scientific, it must be able to be tested and conceivably falsified³. As such, it is counter to state-of-the-science research methods to use the word “proven” in a social scientific context, considering that social scientific research cannot be used to “prove” a particular theory or relationship, but rather establish evidence on the statistically likelihood of its existence.

Rebuttal Opinion 3: Dr. Bouché references no reliable, empirical data to conclude that pornography is associated with low self-esteem and body image, eating disorders, impaired brain development, and other emotional and mental illnesses.

The article⁴ Dr. Bouché chose to reference in her declaration in relation to this issue clearly states that, “as most of the studies (24/26) included in this review were cross-sectional in nature, ***causal relationships between pornography exposure and body image cannot be assumed***...*findings cannot be generalized to adolescents...other limitations include a potential bias in overall sampling...self-selection bias may thus also limit the generalizability of findings.*”

² Beyens, I., Vandenbosch, L., & Eggermont, S. (2015). Early adolescent boys’ exposure to Internet pornography: Relationships to pubertal timing, sensation seeking, and academic performance. *The Journal of Early Adolescence*, 35(8), 1045-1068.

³ For example, see Popper, Karl R. 1963. *Science as Falsification. Conjectures and Refutations*. Retrieved from: <https://staff.washington.edu/lynnhank/Popper-1.pdf>

⁴ Paslakis, G., Chiclana Actis, C., & Mestre-Bach, G. (2022). Associations between pornography exposure, body image and sexual body image: A systematic review. *Journal of Health Psychology*, 27(3), 743-760.

Dr. Bouché references the abstract of another study to claim that there is a “negative association between reported pornography hours per week and gray matter volume in the right caudate area of the brain⁵.” The study acknowledges that these findings are limited, especially by the small sample size⁶. Moreover, subsequent research further questions the reliability of these findings, citing, “*Although recent neuroimaging studies have suggested some possible neurobiological mechanisms of CSB, these results should be treated as tentative given methodological limitations (e.g., small sample sizes, cross-sectional designs, solely male subjects, and so on). Current gaps in research exist complicating definitive determination whether CSB is best considered as an addiction or not.*”⁷

Despite the repeated discussion of limitations across the literature and the clear statement that a causal relationship between pornography and low self-esteem and body image issues cannot be assumed in her own references, Dr. Bouché’s declaration suggests that this association is “established.”

Rebuttal Opinion 4: Dr. Bouché references no reliable, empirical data to conclude that pornography increases the demand for prostitution, child exploitation, and child pornography.

Based on my research, education, and experience, I am not aware of any reliable academic or scientific literature which definitively concludes that pornography increases the demand for prostitution. While Dr. Bouché does claim that one study “concluded” that men who were arrested for solicitation of prostitution were twice as likely to report having watched pornographic movies over the preceding year than the national sample, this purported “conclusion” cannot be used to establish causal inference and in no way reliably assesses demand for pornography.

Although it is unclear which study Dr. Bouché is referring to, given the absence of citations throughout her declaration, it is possible that she was referring to a 2005 comparison of male customers of female street prostitutes with national samples of men⁸. If this is the article Dr. Bouché was referencing, it fails to make any causal inference between pornography and prostitution.

Moreover, in her past publications, Dr. Bouché claims that “a growing body of research implicates pornography for driving the demand for prostituted women.”⁹ Dr. Bouché does not cite to any peer-reviewed research or book to support this statement, and rather, cites to a reading list from a now apparently defunct non-profit known as “Captive

⁵ Kühn, S., & Gallinat, J. (2014). Brain structure and functional connectivity associated with pornography consumption: the brain on porn. *JAMA psychiatry*, 71(7), 827-834.

⁶ Participants limited to 64 men.

⁷ Kraus, S. W., Voon, V., & Potenza, M. N. (2016). Neurobiology of compulsive sexual behavior: Emerging science. *Neuropsychopharmacology*, 41(1), 385.

⁸ Monto, M. A., & McRee, N. (2005). A comparison of the male customers of female street prostitutes with national samples of men. *International Journal of Offender Therapy and Comparative Criminology*, 49(5), 505-529.

⁹ See, for example, Bouché V. Sex trafficking: Inside the business of modern day slavery. *Hum Rights Q.* 2011;33(3):899-906,922. <http://mutex.gmu.edu/login?url=https://www.proquest.com/scholarly-journals/sex-trafficking-inside-business-modern-day/docview/902827795/se-2>. doi: <https://doi.org/10.1353/hrq.2011.0034>

Daughters¹⁰.” Not only is Captive Daughters not a reliable or empirically based organization, but the group makes erroneous and entirely unfounded claims that:

- All women who engage in pornography are prostitutes;
- All pornographers are pimps;
- All prostitution is trafficking;
- Prostitution is paid serial rape;
- Prostitution is a form of violence against women; and
- The distinctions between trafficking, prostitution, and child prostitution are “false¹¹.”

Not only are the claims by Dr. Bouché’s cited source antithetical to all rigorous empirical research within the field, but they are also counter to recommendations by leading human rights organizations, such as Amnesty International, which have published policy and research on the need for decriminalization and protection of sex workers’ rights¹².

Ultimately, to support this topic, Dr. Bouché references an abstract of an article, which claims “individuals with a younger “age of onset” for adult pornography use were more likely to engage in deviant pornography (bestiality or child) compared to those with a later “age of onset”¹³.” However, the findings in no way support the thesis of her opinion or the sexual material health warnings. Moreover, the findings were significantly limited and not appropriate for generalizability. The sample was overwhelmingly women and, of the sample, 76.1% (92) of men watched no pornography or adult-only pornography and 93.4% (458) of women watched no pornography or adult-only pornography. While 16 men and 16 women admitted to watching child pornography in this study, the findings fail to draw any link between adult-pornography use and deviant sexuality.

¹⁰ See Captive Daughters, Reading List (2011) available at <http://www.captivedaughters.org/readinglist.htm>.

¹¹ See, for example, Mantilla K. CAPTIVE DAUGHTERS: Conference on pornography and international sex trafficking. *Off Our Backs*. 2005;35(7):17-23,32-37.
<http://mutex.gmu.edu/login?url=https://www.proquest.com/magazines/captive-daughters-conference-on-pornography/docview/197135694/se-2>

¹² Amnesty International. (2016). Amnesty International publishes policy and research on protection of sex workers’ rights. Retrieved from: <https://www.amnesty.org/en/latest/news/2016/05/amnesty-international-publishes-policy-and-research-on-protection-of-sex-workers-rights/#:~:text=It%20recommends%20the%20decriminalization%20of,general%20organization%20of%20sex%20work.>

¹³ Seigfried-Spellar, K. C., & Rogers, M. K. (2013). Does deviant pornography use follow a Guttman-like progression?. *Computers in Human Behavior*, 29(5), 1997-2003.

Conclusion

Based on my education, research, experience, and the materials reviewed, I declare under penalty of perjury:

There are no reliable data causally linking pornography to an increased demand for prostitution and therefore it is not accurate to conclude that pornography leads to an increased demand for prostitution. There are no reliable data causally linking pornography to an increased demand for child exploitation and therefore it is not accurate to conclude that pornography leads to an increased demand for child exploitation. There are no reliable data causally linking pornography to an increased demand for child pornography and therefore it is not accurate to conclude that pornography leads to an increased demand for child pornography. Ultimately, Dr. Bouché's opinions are not based on or supported by state-of-the-science research or reliable data.

DECLARATION UNDER PENALTY OF PERJURY

Pursuant to 28 U.S.C §1746, I declare under penalty of perjury that the above statements are true and based upon my personal knowledge.

Executed on August 21, 2023, at Montclair, Virginia.

A handwritten signature in black ink, appearing to read 'Keyzo' or similar, with a stylized, cursive script.

DR. KIMBERLY MEHLMAN-OROZCO, Subject Matter Expert and CEO of Break the Chain LLC

APPENDIX A. CURRICULUM VITAE

DR. KIMBERLY B. MEHLMAN-OROZCO

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EDUCATION

Doctor of Philosophy

Criminology, Law and Society
George Mason University

Dissertation: The “Crimmigration” Affect: An Analysis of 287(g) and Latino/a Representation in the U.S. Juvenile Justice System

Expertise: Human Trafficking, Human Smuggling, Immigration, Survey Methods and Systematic Review

Master of Arts

Justice, Law, and Crime Policy
George Mason University

Thesis: Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia

Bachelor of Science

Administration of Justice
George Mason University

Cum Laude

TEACHING EXPERIENCE

Surviving and Thriving Beyond Sex Trafficking SP18

Ph.D. Research Course
Sustainability Education
Prescott College

CRIM307 Social Inequality, Crime, and Justice FA17

Criminology, Law and Society
George Mason University

CRIM405 Law and Justice Around the World SP17, SP18

Criminology, Law and Society
George Mason University

CRIM308 Human Rights and Justice FA16

Criminology, Law and Society
George Mason University

CCJS100 Intro to Criminal Justice FA12-SP14

Department of Criminology & Criminal Justice
University of Maryland College Park

CCJS370 Race and Crime FA12-SP14

Department of Criminology & Criminal Justice
University of Maryland College Park

CCJS432 Law of Corrections	FA12 Department of Criminology & Criminal Justice University of Maryland College Park
CCJS418J Foreign Nationals and Crime	FA12-SP13 Department of Criminology & Criminal Justice University of Maryland College Park
CRIM490 Foreign Nationals and Crime	SU09, SU10, SU11, SU12 Criminology, Law and Society George Mason University
GED, Work Place Essential Skills, and Adult Basic Education	SU05-SU06 Adult Detention Center Prince William County
<u>RESEARCH EXPERIENCE</u>	
CEO	FA19– Present Break the Chain
Executive Director	WI18– Present Freedom Light
Partner/Human Trafficking Expert Witness	FA16– WI18 Mahn, Mehlman & Associates
Human Trafficking Subject Matter Expert	SU16-FA17 RAND Corporation
Executive Director/Human Trafficking Consultant	WI12– FA16 The Justitia Institute
Director	FA10 – WI12 Latino Policy Institute Roger Williams University
Research Associate	SU11 – WI12 Cochrane Collaboration College for Policy George Mason University
Lead Clinical Trials Search Coordinator	SU10 – WI12 Justice Health Field The Cochrane Collaboration
Senior Research Associate	SU08 – SU11 OJJDP Census of Juveniles on Probation George Mason University
Graduate Research Assistant	SU10 – FA10 Violence and Victimization Research Division National Institute of Justice (On Contract)

	Office of Justice Programs
Senior Fellow	SU08 – FA10 The Lloyd Society
Graduate Research Assistant	SU06 – SU08 Trinidad & Tobago Crime Reduction Project George Mason University
Graduate Research Assistant	WI07-SP07, SP08 OJJDP Vaccines for Children Project George Mason University

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- Trasatti, Marisa and **Mehlman-Orozco, Kimberly B.** (2021). Human Trafficking Is Growing Exponentially: What your Corporation and Clients Need to Know about the Evolving Litigation Landscape. Lawyers for Civil Justice Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Harvey, Brittany. (2021). Human Trafficking: The Silent Risk. RIMS Annual Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Yesowitch, Irene, Vorndran, Maryann, and Miller, Graham. (2020). Training to Combat Human Trafficking at Your Commercial Premise. Cyber, Management & Professional Liability Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Clark, Fran, et. al. (2020). Training to Combat Human Trafficking at your Commercial Premise– Learn the Emerging Risks, Litigation Issues and Preventative Measures. Claims and Litigation Management Alliance Conference.
- Trasatti, Marisa, **Mehlman-Orozco, Kimberly B.**, Ewing, Lance. (2020). Human Trafficking: The Silent Risk. Claims and Litigation Management Alliance Conference.
- Mehlman-Orozco, Kimberly B.** (2019). Keynote Speaker: National Capital Region Threat Intelligence

Consortium (NTIC) Human Trafficking Seminar.

Mehlman-Orozco, Kimberly B. (2019). Law Enforcement's Role in Combating Human Trafficking and Assisting Victims. Police Executive Research Forum (PERF).

Mehlman-Orozco, Kimberly B. and Marisa Trasatti (2019). Human Trafficking: The Silent Risk. The RIMS (Risk Management Society) Conference.

Mehlman-Orozco, Kimberly B. (2019). Social Policy and Justice Panelist. Harvard College Project of Asian and International Relations. Harvard University.

Mehlman-Orozco, Kimberly B. (2018). Women in Homeland Security Human Trafficking Symposium Panelist. Marymount University.

Mehlman-Orozco, Kimberly B. (2017). Human Trafficking Symposium Panelist. Liberty University School of Law.

Martin, Favian, **Mehlman-Orozco, Kimberly**, and Wooditch, Alese. (2014). Mexican Migration to the United States: An Exploratory Study into Illegal Border Crossings. Academy of Criminal Justice Sciences. Philadelphia, PA

Mehlman-Orozco, Kimberly B. (2010). "Justice Health Systematic Review Methods," Presented at the annual colloquium of the Cochrane and Campbell Collaborations: Keystone, CO.

Mehlman-Orozco, Kimberly B. (2010). "Open Access Systematic Reviews for Juvenile Probation Information," Presented at the first annual OJJDP Probation Summit: Washington, D.C.

Mehlman-Orozco, Kimberly B., Chirieleison, J., Sebold, C. M., Douds, A., Gallagher, A.M., and Gallagher, C.A. (2010). "Characteristics of Juveniles on Probation: Collecting Data from Atlantic to Pacific". Presented at the 2010 American Probation and Parole Association Conference: Washington, D.C.

Mehlman-Orozco, Kimberly B. (2010). "Justice Health Search Methods: PubMed and More," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.

Gallagher, C.A., Douds, A.S., **Mehlman-Orozco, Kimberly B.**, Chirieleison, J., and Olaghere, A. (2010). "Justice Health Bibliographic Data Mapping," Presented at the International Network for Justice Health Meeting: Scottsdale, AZ.

Mehlman-Orozco, Kimberly B. (2010). "Smuggling and the Likelihood of Detention among Undocumented Migrants," Law and Society Association Conference: Chicago, IL.

Douds, Anne S. and **Mehlman-Orozco, Kimberly B.** (2010). "FASD in Justice Facilities: What does the research tell us?", Meeting of the Interagency Coordinating Committee on Fetal Alcohol Spectrum Disorders: Rockville, MD.

Gallagher, Catherine, Taxman, Faye, Kinner, Stuart, Doyle, Jodie, Pardo-Rengifo, Monica, **Mehlman-Orozco, Kimberly B.**, Olaghere, Ajima, Royle, Nick, Gabriel Cuervo, Luis. (2009). "Knowledge mapping for research prioritization: examples from the Network for Justice Health". 17th Cochrane Colloquium, Singapore.

Mehlman-Orozco, Kimberly B. (2009). "Justice Health Systematic Review Methods," Presented at the International Network for Justice Health Meeting: Orlando, FL.

Mehlman-Orozco, Kimberly B. (2008). "Foreign Nationals and Crime: An Exploratory Analysis of Undocumented Migrants in Northern Virginia," American Society of Criminology Conference: St. Louis, MO.

OTHER PRESENTATIONS

Mehlman-Orozco, Kimberly B. (2018). Invited Trainer on Human Trafficking Provided to the Advancing the Business of Healthcare Medical Coding Chapter in Woodbridge, Virginia (2 CEUs).

Mehlman-Orozco, Kimberly B. (2018). Invited Trainer on Human Trafficking for the Canadian Police College Human Trafficking Investigator's Course, Royal Canadian Mounted Police and Halifax Regional Police, Canada.

Mehlman-Orozco, Kimberly B. (2018). Invited Annual Speaker for the College of Humanities and Social Sciences Degree Celebration, George Mason University.

Mehlman-Orozco, Kimberly B. (2018). Invited Presenter for the Well Library Honors Event, George Mason University.

Mehlman-Orozco, Kimberly B. (2017). Invited Training Presentation on Human Trafficking Red Flags for Prevent Abuse and Neglect through Dental Awareness (P.A.N.D.A.).

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker for Human Trafficking Awareness Event with Kappa Delta Phi International Sorority, George Mason University.

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker at the Mother's Union International Conference Human Trafficking Forum.

Mehlman-Orozco, Kimberly B. (2017). Invited Guest Speaker at the Keeping Our Youth Safe Conference. Bernadette's House.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker for Girls at High-Risk of Sex Trafficking. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Woodbridge Woman's Club.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Soroptimist International, Alexandria Chapter.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking. Republican Women of Clifton.

Mehlman-Orozco, Kimberly B. (2016). Invited Guest Speaker on Human Trafficking in Northern Virginia. Westminster at Lake Ridge.

Mehlman-Orozco, Kimberly B. (2016). Keynote Speaker. Soroptimist Human Trafficking Awareness

Event.

Mehlman-Orozco, Kimberly B. (2015). Invited Guest Speaker on Human Trafficking. Trinity Episcopal Church.

Mehlman-Orozco, Kimberly B. (2015). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2014). Invited Guest Speaker for TEAM Summer Quest: High-Risk Youth Diversion Program. Manassas City Police Department.

Mehlman-Orozco, Kimberly B. (2014). Invited Guest Speaker on Mapping Suspected Human Trafficking Networks through Advertisements. Homeland Security Investigations, DHS, Buffalo, NY.

Mehlman-Orozco, Kimberly B. (2013). Exhibitor. Governor's Summit on Human Trafficking. Richmond, VA.

Mehlman-Orozco, Kimberly B. (2013). Invited Guest Speaker on Labor Trafficking. St. Francis of Assisi Catholic Church.

Mehlman-Orozco, Kimberly B. (2011). Keynote Speaker. First Annual Quetzal Award Gala. Guatemalan Center of New England.

EXPERT WITNESS CASES—CONSULTATION AND/OR TESTIMONY

Forthcoming	Woodhull Freedom Foundation et al. v. United States.
2023	J.C. as mother and legal guardian of I.R. (a minor), v. RITI, INC d/b/a AMERICAN INN & SUITES, 1:22-cv-00848-MHC
2023	G.W. v. Northbrook Industries, Inc. D/B/A United Inn and Suites. Civil Action No. 1:20-cv-05232-JPB
2023	A.G. v. Northbrook Industries, Inc. D/B/A United Inn and Suites. Civil Action No. 1:20-cv-05231-JPB
2023	Expert Report for Community Legal Services of Ottawa file No. 20220503-C-0015992R.
2023	Government of the United States Virgin Islands v. JP Morgan Chase Bank, N.A. and JP Morgan Chase Bank, N.A. v. James Edward Staley Case No. 22-cv-10904-JSR
2023	Jane Doe 1 v. JP Morgan Chase & Co. Case No. 1:22-cv-10019-JSR
2023	People of the State of California v. Angelina Avila Case No. BA508653-02
2023	M.H. v. G6 Hospitality LLC, et. al. United States District Court Eastern District of Texas Sherman Division. 4:22-cv-198

2023	United States of America v. Kamal Bhula, et al. United States District Court, For the District of New Mexico. Case No. 1:19-cr-01631-DHU
2023	United States of America v. Mei Xing, United States District Court for the Central District of California. No. 2:20-CR-0228(A)-FMO
2023	Jane Doe v. Fairfax County Police. 1:21cv1150(AJT/JFA).
2022	Charity Pearrow v. ESA P Portfolio LLC, et. al. 21-cv-62276-BLOOM/Valle
2022	K.R. v. 4200 Roosevelt LLC, et. al. Case Number 00552
2022	C.A. v. 4200 Roosevelt LLC, et. al. Case Number 03355
2022	B.H. v. 4200 Roosevelt LLC, et. al. Case Number 03356
2022	K.C. v. 4200 Roosevelt LLC, et. al. Case Number 01926
2022	T.E. v. 4200 Roosevelt LLC, et. al. Case Number 00994
2022	V.S. v. 4200 Roosevelt LLC, et. al. Case Number 00997
2022	Sherman, Gozun, and Nash v. Trinity Teen Solutions, Inc. Case Number 20-CV-215-SWS
2022	N.Z. v. Knights of Trevoise, et. al. Civil Action Number 02642
2022	G.D. v. Knights of Trevoise, et. al. Civil Action Number 02631
2022	Jane Doe 1-4 v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-04278-WMR
2022	W.K., et. al. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:20-cv-5263-VHC
2022	J.A. v. Red Roof Inns, Inc., et. al. Civil Action Number 1:21-cv-03655-TWT
2022	Casilao et. al. v. Hotelmacher LLC, et. al. Case No.: CIV-17-800-SLP
2022	S.Y. v. Inn of Naples Hotel LLC and Inn of Naples, LLC. Case No.: 2:20-cv-00609-JES
2022	S.Y. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00608
2022	C.S. v. Inn of Naples Hotel, LLC and Inn of Naples, LLC 2:20-cv-

	00629
2022	C.S. v. Naples Hotel Company and the Gulfcoast Inn of Naples Owners Association, Inc. 2:20-cv-00631
2022	People of the State of California v. Diane Mirabal. Superior Court of the State of California for the County of Santa Clara. Case No.: 98312
2021-Present	MADELYN CASILAO, HARRY LINCUNA, and ALLAN GARCIA, on behalf of themselves and all others similarly situated, Plaintiffs, v. HOTELMACHER LLC, dba HOLIDAY INN EXPRESS; STEAKMACHER, LLC, dba MONTANA MIKE'S STEAKHOUSE; SCHUMACHER INVESTMENTS, LLC, dba WATER ZOO; APEX USA, INC.; WALTER SCHUMACHER; and CAROLYN SCHUMACHER, Defendants. UNITED STATES DISTRICT COURT WESTERN DISTRICT OF OKLAHOMA Case No.: CIV-17-800-SLP
2021-2022	Jane Doe v. TRX Insurance Services, Inc and Richard Metz. United States District Court for the Eastern District of Pennsylvania. Civil Action No. 2:20-cv-04095-MMB
2021-2022	The People of the State of California v. Rachele Eschenburg. Case Number: FCR350232
2021	Heidi Gilbert, Amber Means, Mandy Meloon, Gabriela Joslin, and Kay Poe, v. U.S.A Taekwondo, Inc., District of Colorado
2019-2021	United States v. Matthew Woods, United States District of New Mexico ¹⁴
2019	United States v. Adonis Baker, United States District of New Mexico
2019	United States v. Cornelius Galloway, United States District of New Mexico
2018	RCMP Federal Serious and Organized Crime R vs. Downey & Beals C/O Human Trafficking 2016-465660, Halifax, Canada
2018	United States of America vs. Savanah April Via, U.S. District Court for the District of Arizona
2018	Commonwealth of Virginia v. Corey Cardoza, Henrico County
2018	People v. Kareem Abdur-Razzaq, Ind. No. 3154/2013, and

¹⁴ Case 1:17-cr-01235-WJ. Daubert Order where Chief United States District Judge William P. Johnson issued an order stating, "Dr. Mehlman-Orozco considers herself a leading expert in cases on sex trafficking and the Court agrees with that self-description."

	People v. Lemuel Skipper, Ind. No. 2409/2015, Bronx County
2017-2020	United States of America v. Miguel Scott Arnold, Terrence Hawkins, Tevin Bynoe, Emonie Murphy, and Joshua Guity-Nunez, United States District Court for the Middle District of Pennsylvania.
2017- 2018	Doe v. Subh Properties, et al., Civil Litigation, State of Maryland
2017-2018	State of Ohio v. Michael Moore, Lucas County Court
2017-2018	People of the State of California Plaintiff v. Tracy Sims Superior Court of California, County of Los Angeles
2017	Keo Ratha; Sem Kosal; Sophea Bun; Yem Ban; Nakry Phan; and Sok Sang v. Phatthana Seafood Co., Ltd; S.S. Frozen Food Co., Ltd.; Doe Corporations 1-5; Rubicon Resources, LLC; and Wales & Co. Universe, Ltd. United States District Court for the Central District of California
2017	In re: REFLEX MEDIA, INC., a Nevada corporation, Claimant, vs. VIBE MEDIA, INC. d/b/a CityVibe.com, a California corporation; SOPHIA THOMPSON, an individual; PEAKRIDGE d/b/a SugarModels.com, an Anguilla company; DANIEL ROMAN a/k/a Daniel Romanesque, an individual; ALI ASKARI, an individual; and DOES 1 through 10, inclusive
2016-2017	J.S., S.L., and L.C. v. Village Voice Media Holdings LLC, Supreme Court of the State of Washington
2016-2017	People of the State of California Plaintiff v. James Joseph, et. Al. Contra Costa County Court
2016	People of the State of California Plaintiff v. Young Kyung Cho Superior Court of California, County of Los Angeles
2016	People of the State of California Plaintiff v. Mixon-Givens Santa Clara County Court

SELECTION OF MEDIA

June 20, 2023.	CBS. St. Charles police arrest five people in connection with human trafficking enterprise.
April 6, 2023	Forbes. Sex Traffickers Used America's Favorite Family Safety App To Control Victims.
January 10, 2023	U.S. News & World Report. Jury Hears Case Alleging 4 Cops Enabled Prostitution Ring.
September 1, 2022	Court TV. Only Fans Model Murder Case.

July 31, 2022	CGTN. Kimberly Mehlman-Orozco on the role of internet in human trafficking.
July 22, 2022	Court TV. Crystal Kizer: Sex Trafficking Murder Case.
December 16, 2021	NPR. The Facts Of, The Myths About, And The Solutions For Child Trafficking.
April 24, 2021	CBS News. Manhattan District Attorney's office to stop prosecuting prostitution cases.
April 10, 2021	Fox News. Human smugglers using social media to transport migrants to US: Reports.
April 4, 2021	Forbes. Inside the \$4.5 Billion Erotic Massage Parlor Economy.
July 4, 2020	CBS News. Epstein's alleged accomplice Ghislaine Maxwell set to be arraigned next week.
January 23, 2020	Skift. Opening Closed Doors: Can Hotels Do More to Fight Human Trafficking?
August 9, 2019	ABC. This Week with George Stephanopoulos. Panel discussion on Jeffrey Epstein.
July 9, 2019	CBS News. Sex trafficking expert discusses Jeffrey Epstein case and sexual abuse.
May 10, 2019	Hollywood Reporter. Sex Trafficking mars the Mystique of Cannes Film Festival.
April 12, 2019	The Hill. Expert says it's 'very unlikely' Robert Kraft prostitution case would yield human trafficking convictions.
March 21, 2019	CBS. Robert Kraft solicitation charge puts spotlight on sex trafficking.
March 4, 2019	The Washington Post. Surveillance cameras, suitcases and billionaires: How an investigation into massage parlors unfolded in Florida.
March 1, 2019	USA Today. From harmful fetishes to sex trafficking, Robert Kraft case highlights risks facing Asian women.
February 24, 2019	CNN. Robert Kraft allegations: A sex trafficking expert weighs in.
January 11, 2019	The Seattle Times. Documentary puts new attention on R. Kelly sex allegations.
August 22, 2018	The Crime Report. Backpage Founders: We're Victims of Attack on Free Speech.

May 5, 2018	Delaware Online. Human Trafficking Court shut down, to be merged with other treatment courts in Delaware.
May 1, 2018	Delaware Online. Despite good intentions, Delaware slow to address human trafficking.
April 24, 2018	ABC. Will new law protect women from sex trafficking?
April 23, 2018	The Ringer. How Sex Ads Became a Battleground for the Future of the Internet.
April 22, 2018	Miami Herald. He pimped a minor at Santa's Enchanted Forest. He got slapped with federal prison.
April 13, 2018	Yahoo Lifestyle. Women's March lambasted for criticizing shutdown of Backpage.com.
April 10, 2018	Miami Herald. Florida's sex industry 'in a panic' after feds shut down notorious Backpage website.
April 9, 2018	The Crime Report. With Backpage Closed, Where Will The Sex Slave Trade Go?
March 22, 2018	Washington Post. Bill enabling prosecutors, victims to pursue websites that host sex traffickers heads to White House.
March 2, 2018	Governing. 3 Cities Lead Fight Against Human Trafficking.
February 1, 2018	Vanity Fair. The Republican Party is Having Another Todd Akin Fiasco.
February 1, 2018	New York Magazine. Missouri GOP Senate Hopeful Goes Off the Deep End on the Sexual Revolution and Human Trafficking.
January 31, 2018	Kansas City Star. Josh Hawley blames sex trafficking on 'sexual revolution' of 1960s in leaked audio.
January 25, 2018	Homeland Security Today. Expert Delves Into Real Face of Human Trafficking: Victims and Perpetrators.
January 23, 2018	Huffington Post. Study Finds More Than 9,000 Brothels Masquerading As Legit Businesses.
January 11, 2018	International Business Times. Human trafficking: Why we are all guilty of supporting the modern slave trade.
January 8, 2018	Majority Report Radio. America's Slaves of the New Millennium with Dr. Kimberly Mehlman-Orozco.

December 21, 2017	Fast Company. Hotels Are Key In The Fight To End Human Trafficking.
December 12, 2017	WNPR. The Colin McEnroe Show. Child Labor In America And Abroad.
November 4, 2017	C-SPAN. Hidden in Plain Sight Book Talk.
September 22, 2017	Gray Media. Interview by Kyle Midura. Sex Trafficking Internet Crackdown Proposal.
August 8, 2017	i24 news. Interview for Stateside with David Shuster. Model allegedly kidnapped for dark web auction.
August 2, 2017	Newsy. Interview for “The Why” on human trafficking on the Internet.
July 30, 2017	Al Jazeera. Segment Produced by Ruairi Casey. World Day Against Human Trafficking.
July 25, 2017	Fox News Radio. Interviewed by Eben Brown. “Security America” segment on human smuggling deaths in San Antonio.
July 25, 2017	Dallas News. Interviewed by Sarah Mervosh. New trick of the sex trade: Pimps can use retail gift cards to buy Backpage.com ads.
July 24, 2017	WJLA. Interviewed by Stephen Loiaconi. Human smuggling deaths underscore need for immigration reform, experts say.
July 18, 2017	The Washington Post. Interviewed by Tom Jackman. Under attack, Backpage.com has its supporters as anti-trafficking tool. But many differ.
June 11, 2017	PJ Media. Interviewed by Karl Herchenroeder. Expert Notes Gap in Human-Trafficking Laws as Senators Press for Fund Renewal.
April 19, 2017	WYPR. Interviewed by Tom Hall. Misinformation Sparked #DCMissingGirls Outrage, But It Highlights Real And Overlooked Issues.
March 30, 2017	CBS. Interviewed by Jennifer Earl. Mom’s warning about “human trafficking” at IKEA goes viral; what you need to know.
March 29, 2017	Women’s Health. Interviewed by Korin Miller. This Mom Claims She Encountered Human Traffickers At IKEA And People Are Freaking Out.
February 10, 2017	Miami Herald. Interviewed by David Ovalle. Florida lawsuit targets website decried as hub for human trafficking.
February 3, 2017	Miami Herald. Interviewed by David Ovalle. The ‘adult’ section

might be closed but Miami sex workers still on the job.

January 1, 2017

OutSmart Magazine. Interviewed by Dr. Laura McGuire on Human Trafficking. Hidden in Plain Sight: Researcher Dr. Mehlman-Orozco Discusses the Realities of Human Trafficking.

August 15, 2013

USA Today, Interviewed by Yamiche Alcindor. Dozens of States Pass Laws to Fight Human Trafficking.

June 6, 2013

USA Today. Interviewed by Yamiche Alcindor. Blue Campaign by DHS aims to combat human trafficking.

June 2, 2010

Style Weekly. Interviewed for a human trafficking story by Peter Galuszka, "The New Slavery: Virginia becomes haven for human trafficking."

OTHER PROFESSIONAL TRAINING

No Room for Trafficking Summit

Summer 2021

Summit

AHLA Foundation

Intelligence Community Conference

Summer 2021

Conference

Traffik Analysis Hub

Transportation Industry Against Human Trafficking

Fall 2020

Presentation

U.S. Department of Commerce

"Freedom Together" D.C., M.D., and V.A. Regional Anti Human Trafficking Task Force Conference

Spring 2018

Conference

D.C., M.D., and V.A. Task Forces

Virginia Forum on Human Trafficking

Fall 2015

Conference

Dept. of Criminal Justice Services

Regional Conference of Human Trafficking Task Forces

Fall 2015

Conference

DMV Anti-Trafficking Working Group

Maryland Freedom Conference

Winter 2015

Conference

Towson University

Sharing Lessons, Sharing Responsibility: Combating Human Trafficking

Spring 2013

Conference

Migration Policy Institute

Freedom Network Annual Conference

Spring 2013

Conference

Freedom Network

Human Trafficking Panel Discussion

Spring 2013

Working Group

George Washington Law

Analytic Statistics and Meta Analysis

Spring 2011

Paid Training

Stata

Systematic Review and Meta Analysis

Spring 2009, Fall 2010

Independent Graduate Study

GMU

PubMed, NLMGateway, ToxNet and ClinicalTrials.gov

Summer 2009

Search Certifications

National Library of Medicine

Ovid, ProQuest, and Web searches

Summer 2009

Search Certifications

AHRQ

Introduction to ArcGIS Workshops

Fall 2009-Summer 2010

George Mason University

Hand Searching Systematic Review Workshop

Fall 2009

Search Certifications

Cochrane Collaboration

AWARDS*Independent Publisher Award, 2019*Silver Medal for Current Events (Jihadi Next Door).*Independent Publisher Award, 2018*Bronze Medal for Social Issues/Humanitarian (Hidden in Plain Sight: America's Slaves of the New Millennium).*Dissertation Completion Award, 2012*

George Mason University, College of Humanities and Social Sciences.

Deans Challenge Award, 2009

George Mason University, College of Humanities and Social Sciences.

SERVICE

Peer Reviewer

Office of Justice Programs (OJP), 2020-Present

Panel of Expert Witnesses

Los Angeles Superior Court, WI2017-Present

Reviewer

Journal of Human Trafficking, FA2014-Present

Invited Peer Reviewer

Office of Justice Programs, SP2020-Present

Advisory Board Member

Empower Her Network, FA2017- Present

Volunteer

Prince William County Police Santa Cops, WI2021 & WI 2022

Advisory Board Member

Dressember (Anti-trafficking foundation), SP2017-SU2021

Reviewer

Taylor & Francis Books, SP2021

Reviewer

Justice Quarterly, WI2018- FA2019

Survey Methodologist Advisor

United Against Slavery, FA2017-FA2019

Member	Prince William County Human Trafficking Task Force, SU2013-SU2018
Member	Prince George's County Human Trafficking Task Force, SU2012-SU2014
Member and Former President	Soroptimist International of Woodbridge, FA2015-SP2018
Reviewer	American Journal of Evaluation, FA2014-FA2015
Member	Prince George's County Human Trafficking Task Force, SU2013-2015
Reviewer	Columbia University Press, FA2013
President and Founding Officer	Student Center for Immigration Research, George Mason University, FA2008 – FA2010
Member	Criminology, Law & Society Student Association, George Mason University, FA2009 – WI2012
Volunteer	Prince William County Jail, Classification Department, 500 hours, SP 2005

PROFESSIONAL MEMBERSHIP

National Society for Collegiate Scholars
 Phi-Alpha Delta Pre-Law Fraternity
 Alpha Chi Honors Fraternity
 American Society of Criminology
 National Criminal Justice Honors Fraternity
 Alpha Phi Sigma Honors Society